

EXHIBIT E

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION
4

5 ROBERT HUFF,
6 Plaintiff,

7
8 v

Case No. 17-13556

9

HON. SEAN F. COX

10 VELO ASSOCIATES, PLC, et al,

MAGISTRATE JUDGE

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ELIZABETH A. STAFFORD

12 Defendants.
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The Deposition of PATRICK SOMMERVILLE, 30(b)(1)

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Taken at 43695 Michigan Avenue,

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Canton, Michigan 49503,

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Commencing at 10:31 a.m.,

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Friday, June 29, 2018

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Before Diane H. Draugelis, CER-2530.

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1 APPEARANCES:

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3 CURTIS C. WARNER

4 Warner Law Firm, LLC

5 350 South Northwestern Highway

6 Suite 300

7 Park Ridge, Illinois 60068

8 847.701.5290

9 cwarner@warnerlawllc.com

10 Appearing on behalf of the Plaintiff.

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12 KATRINA MARIE DEMARTE

13 Brock & Scott, PLLC

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15 Suite 150

16 Ann Arbor, Michigan 48104

17 734.222.5179

18 Katrina.Demarte@brockandscott.com

19 Appearing on behalf of the Patrick Sommerville.

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1 BY MR. WARNER:

2 Q. And I should have phrased the question better and there
3 was an objection. I'm excluding things on the website.
4 So, for example, for the URL
5 http://accountadjustment.us/accountadjusmentbureau does
6 not control the content of what's on that website?

7 A. I don't own the company, I manage it. As the manager
8 or the consultant, I don't have any direct input into
9 this. What the owner does to it, I have no idea.

10 Q. Going back to the lawsuit that you had indicated that
11 Mr. Velo was sued on, do you remember that previous
12 question?

13 A. Can you give me the plaintiff's name?

14 Q. It's just the other lawsuit that you had just talked
15 about that you gave the deposition in.

16 A. Okay.

17 Q. Do you remember what the allegations against Mr. Velo
18 were?

19 A. Not particularly, no.

20 Q. Okay. What is Account Adjustment Bureau's relationship
21 with the Velo Law Firm?

22 A. Client/attorney.

23 Q. And how did Account Adjustment Bureau hire the Velo Law
24 Firm?

25 A. I'm not sure. He was part of the operation or part of

1 the relationship when I took over as general manager

2 October 31st of 2015.

3 Q. So who would have been in your position prior to
4 October 31st, 2015 at Account Adjustment Bureau?

5 A. William Mcarary. McCrary?

6 Q. Do you know where Mr. Mcarary is?

7 A. I have no idea. I let him go.

8 Q. How do you spell his last name?

9 A. M-c-a-r-a-r-y, I believe, Mcarary, something like that.
10 M-c-r? Mcarary. I'd have to look it up. I don't
11 remember. You have to remember I'm 67 years old. I'm
12 forgetting things.

13 Q. Okay. My father is in his 80's. He's still pretty
14 sharp.

15 A. Oh, well. Pretty sharp?

16 Q. I don't give any credence to a person's age.

17 A. Okay. All right. Well, I can't use that excuse
18 anymore.

19 Q. Is there a written contract between Account Adjustment
20 Bureau and the Velo Law Firm for the Velo Law Firm's
21 services?

22 A. I haven't seen one, but I'm sure there is. Haven't
23 looked. It's just a given. I'm sure there is. Every
24 attorney that we've done business with since my
25 administration we've had contracts, so there was.

1 Adjustment Bureau does?

2 A. Towards commercial accounts, I would say yes. But this
3 only references commercial accounts.

4 Q. Account Adjustment Bureau also does consumer accounts;
5 correct?

6 A. Correct.

7 Q. Like, for example, in regards to Mr. Huff, a debt
8 regrading a rental of a mobile home in a site lot?

9 A. Was that what it was? I'm not sure if it was both the
10 site lot and the home.

11 Q. What is your knowledge of the debt of Mr. Huff?

12 A. That it was either a Sun Homes account or a Sun -- it
13 was either the lot rent, or for the home or for both.
14 At one time Mr. Huff was paying the account, and then I
15 believe my recollection is that he went to a debt
16 counselor, possibly. Maybe it's a different account,
17 but I think it says something like that, and then he
18 paid through them and then all of a sudden he quit
19 paying. Sun Homes referred it to Mr. Velo's office or
20 Mr. Renner's office.

21 Q. Well, how does Sun Homes refer it to Mr. Renner's
22 office if it's -- you had mentioned that AAB contracts
23 with the Velo Law Firm.

24 A. They authorize us to hire an attorney for them based on
25 our professionalism and knowledge of the best attorney

1 in Michigan to hire, and we asked Mr. Velo or Mr.

2 Renner if he would take this case.

3 Q. So before when you said Mr. Velo, we're talking Mr.
4 Renner?

5 A. Or, yeah, I confuse those sometimes.

6 Q. Completely, you know -- most attorneys use their name,
7 like Kelley & Evanchek here and --

8 A. He uses a different name.

9 MS. DEMARTE: The only other thing I'd say,
10 you're starting to talk over Mr. Warner a little bit.

11 THE WITNESS: Oh, I'm sorry.

12 MS. DEMARTE: I want to make sure we have a
13 clear record.

14 MARKED FOR IDENTIFICATION

15 DEPOSITION EXHIBIT D

16 10:53 a.m.

17 BY MR. WARNER:

18 Q. I'd like to hand you what we've marked as Exhibit D.

19 MS. DEMARTE: Thank you.

20 BY MR. WARNER:

21 Q. And have you seen the document that we have marked as
22 Exhibit D before?

23 A. I think the only -- first time I looked at it was in
24 possibly discovery or somewhere. I've never seen it
25 other than through discovery through what we supplied.